### **EXHIBIT A**

## Part 573 Safety Recall Report 18V-329

**Manufacturer Name:** Volkswagen Group of America, Inc.

**Submission Date:** JUL 23, 2018 NHTSA Recall No.: 18V-329 Manufacturer Recall No.: 01C5/01C6



#### **Manufacturer Information:**

Manufacturer Name: Volkswagen Group of America, Inc.

Address: 3800 Hamlin Road

Auburn Hills MI 48326

Company phone: 1-800-893-5298

#### **Population:**

Number of potentially involved: 252 Estimated percentage with defect: 100 %

#### **Vehicle Information:**

Vehicle 1: 2012-2016 Volkswagen Eos

Vehicle Type: **Body Style:** Power Train: NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: FEB 16, 2011 - APR 02, 2015

VIN Range 1: Begin: WVWFW7AH1CV000781 End: WVWBW8AH4GV000011 ✓ Not sequential

Vehicle 2: 2013-2016 Volkswagen CC (F)

Vehicle Type: **Body Style:** Power Train: NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: JAN 19, 2012 - NOV 18, 2015

VIN Range 1: Begin: WVWAP7AN9DE500024 End: WVWKP7AN1GE509289 ✓ Not sequential

Vehicle 3: 2012-2012 Volkswagen CC

Vehicle Type : Body Style : Power Train : NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: MAR 02, 2011 - MAR 02, 2011

VIN Range 1: Begin: WVWNN7AN9CE507027 End: WVWHN7ANXCE508202 ✓ Not sequential

Vehicle 4: 2011-2013 Volkswagen GTI (A6)

Vehicle Type : Body Style : Power Train : NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: FEB 25, 2011 - APR 17, 2013

VIN Range 1:Begin: WVWFV7AJ2BW218372 End: WVWED7AJ6DW134105 ✓ Not sequential

Vehicle 5: 2015-2015 Volkswagen e-Golf

Vehicle Type :
Body Style :
Power Train : NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: MAY 21, 2014 - NOV 13, 2014

Vehicle 6: 2011-2016 Volkswagen Golf (A6)

Vehicle Type :
Body Style :
Power Train : NR

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Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: MAR 02, 2011 - OCT 27, 2015

VIN Range 1: Begin: WVWMM7AJ8BW228527 End: WVWUF7AU8GW138533 ✓ Not sequential

Vehicle 7: 2011-2014 Volkswagen Touareg (New)

Vehicle Type: **Body Style:** Power Train: NR

Descriptive Information: 01C5- Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: OCT 28, 2010 - FEB 12, 2014

VIN Range 1: Begin: WVGFG9BP2BD002456 End: WVGDP9BP9ED009335 ✓ Not sequential

Vehicle 8: 2015-2015 Volkswagen Touareg (GP)

Vehicle Type: **Body Style:** Power Train: NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly

documented in Volkswagen's IT systems.

Production Dates: OCT 02, 2014 - NOV 10, 2014

VIN Range 1: Begin: WVGEP9BP0FD001288 End: WVGEG9BP9FD003086 ✓ Not sequential

Vehicle 9: 2012-2015 Volkswagen Tiguan

Vehicle Type: **Body Style:** Power Train: NR

Descriptive Information: 01C5 - Recalled vehicles are zero-series vehicles (very early production vehicles).

Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be

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	incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.
	FEB 28, 2011 - DEC 23, 2014
VIN Range 1:	Begin: WVGBV7AX5CW000006 End: WVGAV7AX3FW567184 ✓ Not sequential
Vehicle 10 : Vehicle Type : Body Style :	2013-2015 Volkswagen Golf (A6)
Power Train:	NR
	01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.
Duadwatian Datas	MAD 22 2012 NOV 02 2014
	MAR 22, 2012 - NOV 08, 2014 Begin: WVWAB7AJ1DW000025 End: WVWLF7AU3FW140152 ✓ Not sequential
Vehicle 11 : Vehicle Type : Body Style : Power Train :	2012-2012 Volkswagen Tiguan NR
Descriptive Information :	01C6 - Recalled vehicles are zero-series vehicles (very early production vehicles). Volkswagen has discovered that documentation about some of the possible modification(s) made to these vehicles during their internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. The recalled vehicles differ from non-recalled vehicles in that the actual build status of the recalled population was not properly documented in Volkswagen's IT systems.
	JUN 23, 2011 -JUN 23, 2011  Begin: WVGAV7AXXCW500173 End: WVGAV7AXXCW500173 Not sequential

#### **Description of Noncompliance:**

Description of the A small number of zero-series vehicles (very early production vehicles) were Noncompliance: sold as used after they were no longer needed for internal use. Volkswagen has

> discovered that documentation about possible modification(s) made during the internal use period may be incomplete. Because of this, Volkswagen cannot verify that the vehicles comply with all applicable regulatory requirements. Out of an abundance of caution, Volkswagen has decided to repurchase and remove

the affected vehicles from the market. Volkswagen is not aware of any

accidents or injuries as a result of this issue.

FMVSS 1: NR FMVSS 2: NR

Description of the Safety Risk: Volkswagen cannot verify that the vehicles comply with all applicable

regulatory requirements. Out of an aubndance of caution, Volkswagen has decided to repurchase and remove the affected vehicles from the market. Due to the missing documentation and unknown potential for modifications made during internal use, Volkswagen cannot specifically identify a safety risk. Volkswagen is not aware of any accidents or injuries as a result of this

issue.

Description of the Cause: The established processes to ensure complete documentation of modification

(s) made during internal vehicle use were not properly followed.

Identification of Any Warning

that can Occur:

#### **Supplier Identification:**

#### **Component Manufacturer**

Name: Volkswagen Group of America

Address: 3800 Hamlin Road

Auburn Hills MICHIGAN 48326

**Country: United States** 

#### **Chronology:**

August 2016: Internal revision report detected pre- and zero-series vehicles sold to customers. For these vehicles at that point usage documentation was unknown

September 2016: Topic was presented in pre-Product Safety Committee of Volkswagen AG. Additional details were requested.

November 2016: Topic was presented to Product Safety Committee of Volkswagen AG. Decision to repurchase pre-series vehicles (no US vehicles were affected). Dealer reports showed that some of these vehicles couldn't be repaired due to diagnosis problems or couldn't be adapted after parts replacement. Analysis started in order to understand and research status of zero-series vehicles.

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April 2017: Topic presented in Product Safety Committee of Volkswagen AG. First analysis results were presented. High complexity due to various hardware/software combinations was detected, of which not all could be identified in IT systems. Task started to cluster hardware/software combinations in order to identify all possible combinations and to evaluate impact.

September 2017: Topic presented in Product Safety Committee of Volkswagen AG; presentation of results of clustering task. Evaluation presented how zero-series vehicles could be identified at time of workshop repair visit to support dealer. Task to develop a more detailed clustering to get a better understanding of the hardware/software combinations.

May 09, 2018: Topic presented in Product Safety Committee of Volkswagen AG were the decision to recall certain zero-series vehicles due to unknown actual vehicle configuration due to missing/incomplete documentation was made. The recall decision was not based on a confirmed safety risk but was based on the fact that the actual vehicle configuration and compliance with applicable standards is unknown. Vehicles may or may not be repairable with replacement parts or existing software updates.

#### **Description of Remedy:**

Description of Remedy Program: Volkswagen has identified a list of approximately 233 zero-series vehicles

that are unable to be repaired with parts or software updates, and will offer to repurchase these vehicles. The remaining affected vehicles will be repaired with updated parts/software as needed to bring them up to required production standards. Volkswagen is not planning to offer a

reimbursement program under this recall.

How Remedy Component Differs The recalled vehicles are zero-series vehicles with an unknown vehicle

from Recalled Component: configuration that may not comply with all applicable regulatory

requirements. Volkswagen will offer to repurchase or repair (if possible) the affected vehicles. Vehicles not included in this recall are zero-series

vehicles that have received modification(s) that were properly documented as per internal processes/requirements.

Identify How/When Recall Condition Vehicles may have been modified during internal use after production was was Corrected in Production: completed.

In August 2016, processes were been implemented in internal IT systems to prevent the sale of special build (e.g. zero-series vehicles) to consumers.

In August 2017, new organizational/process instructions were enacted. New processes ensure that only vehicles conforming to series configuration may be released for sale to consumers.

#### **Recall Schedule:**

Description of Recall Schedule: Dealer/Owner notification anticipated by July 2018

Planned Dealer Notification Date: JUL 12, 2018 - JUL 12, 2018 Planned Owner Notification Date: JUL 13, 2018 - JUL 13, 2018

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NR - Not Reported		

The information contained in this report was submitted pursuant to 49 CFR  $\S573$